



IN THE DISTRICT COURT OF TULSA COUNTY  
STATE OF OKLAHOMA

DISTRICT COURT  
**FILED**

JAN 17 2012

**Stacey Leon Ward,**

Plaintiff,

v.

**Aetna Life Insurance Company,**

Defendant.

SALLY HOWE SMITH, COURT CLERK  
STATE OF OKLA. TULSA COUNTY

**CD-2012 00286**

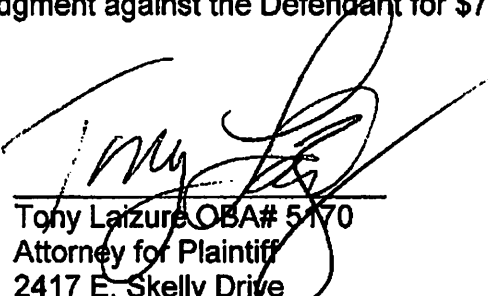
**DANA LYNN KUEHN**

**PETITION**

1. On December 21, 2007, Stacey Ward was employed by the City of Tulsa as a firefighter. Aetna Life Insurance Company funded a policy of group life insurance policy, which benefitted the Tulsa Firefighters Health and Welfare Trust. As such, Stacey Ward was an insured under the policy. The plan in question is a government plan which is exempted from ERISA. Therefore, there is no federal question involved in this case that would subject this case to removal to federal court.
2. On December 21, 2007, Stacey Ward was injured in a motor vehicle accident. As a result, he is now a paraplegic.
3. Under the terms of the policy mentioned above, Aetna should have paid Stacey \$75,000.00. Stacey made a claim for the policy proceeds and Aetna denied the claim on December 9, 2008.
4. Stacey filed suit against Aetna on December 9, 2010. The case was removed to federal court and was dismissed without prejudice on January 20, 2011

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WHEREFORE, Plaintiff seeks judgment against the Defendant for \$75,000.00,  
exclusive of interest and costs.



Tony Laizure OBA# 5170  
Attorney for Plaintiff  
2417 E. Skelly Drive  
Tulsa, OK 74105  
918-749-0749 Phone  
918-747-0751 Fax

Attorney Lien Claimed  
Jury Trial Demanded